



Knuckles Komosinski & Manfro LLP

565 Taxter Road, Suite 590 | Elmsford, New York 10523
Tel (914) 345-3020 | eFax (914) 992-9154 | www.kkmlp.com

Partners
Mark R. Knuckles
Richard F. Komosinski
Jordan J. Manfro

Ernest A. Yazzetti, Jr., Esq.
Associate Attorney
(914) 345-3020, ext. 364
ey@kkmlp.com

December 10, 2019

VIA ECF

Judge Sean H. Lane
US Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: In re: Michele Foley
Case No: 19-23257-shl

Dear Judge Lane:

This office represents SN Servicing Corporation, as servicer for MNH Sub I, LLC, a secured creditor, in the above-referenced matter. Please allow this letter to serve as a status update as to the pending Motion for Relief from Stay with In Rem Relief and Adequate Protection payments.

On August 16, 2019, our office filed a Motion for Relief from Stay with In Rem Relief (ECF Docket No. 15), returnable September 11, 2019. At that hearing, monthly adequate protection payments in the amount of \$4,352.74 were to begin October 1, 2019 and thereafter. An Order directing same was entered on September 19, 2019 (ECF Docket No. 20). Further, Debtor's counsel was to proceed with efforts to void judgment liens and to then proceed with the sale of the property.

As of the filing of this letter, SN has advised that it received the October adequate protection payment on October 10, 2019, but no payments have been made for November or December. Further, we have not received any update as to Counsel's efforts to proceed with the above. Thus, we respectfully renew our request to have the Motion for Relief from Stay granted with In Rem Relief.

If there are any questions, please do not hesitate to contact our office.

Respectfully,
Knuckles, Komosinski & Manfro, LLP

/s/ Ernest A. Yazzetti, Jr., Esq.
Ernest A. Yazzetti, Jr., Esq.
Counsel for SN Servicing Corporation, as servicer for
MNH Sub I, LLC

cc: All counsel - VIA ECF